

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

**IN RE:**

**MIGUEL A. SERRANO FIGUEROA  
MARITZA BERMUDEZ BERMUDEZ**

**DEBTOR(S)**

**CASE NO. 10-05520**

**CHAPTER 13**

**INFORMATIVE MOTION  
(AMENDED CHAPTER 13 PLAN)**

**TO THE HONORABLE COURT:**

Come now(s) Debtor(s), represented by the undersigned attorney, and represents as follows:

1. Debtor(s) inform(s) of the filing of an Amended Chapter 13 Plan pursuant to Rule 1009:

a. Amended Chapter 13 Plan: **to include income tax refund provision.**

**WHEREFORE** applicant(s) pray(s) from this Honorable Court to take notice and allow filing of the amended plan.

**RESPECTFULLY SUBMITTED.**

**NOTICE:** Within twenty eight (28) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

**CERTIFICATE OF SERVICE:** I hereby certify that on this same date I electronically filed the above document with the Clerk of the Court using the CM/ECF System which will send a notification of such filing to all C/MECF participants in this case, including: Chapter 13 Trustee, and to the Assistant U.S. Trustee. Furthermore, I hereby certify that I mailed this document by First Class Mail postage prepaid to the non CM/ECF participants included in the

Case No. **10-05520**

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attached master address list.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, August 2, 2010.

s/JOSE L. JIMENEZ QUINONES

José L. Jiménez Quiñones, Esq.

USDCPR 203808

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United States Bankruptcy Court  
District of Puerto Rico

IN RE:

Case No. **10-05520-13**

**SERRANO FIGUEROA, MIGUEL A & BERMUDEZ BERMUDEZ, MARITZA**

Chapter **13**

Debtor(s)

**CHAPTER 13 PAYMENT PLAN**

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

<b>PLAN DATED:</b> _____ <input type="checkbox"/> PRE <input type="checkbox"/> POST-CONFIRMATION		<input checked="" type="checkbox"/> <b>AMENDED PLAN DATED: 8/02/2010</b> Filed by: <input checked="" type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other	
<b>I. PAYMENT PLAN SCHEDULE</b>		<b>II. DISBURSEMENT SCHEDULE</b>	
<div style="display: flex; justify-content: space-between;"><div>\$ <b>450.00</b> x <b>60</b> = \$ <b>27,000.00</b></div><div></div></div> <div style="display: flex; justify-content: space-between;"><div>\$ _____ x _____ = \$ _____</div><div></div></div> <div style="display: flex; justify-content: space-between;"><div>\$ _____ x _____ = \$ _____</div><div></div></div> <div style="display: flex; justify-content: space-between;"><div>\$ _____ x _____ = \$ _____</div><div></div></div> <div style="display: flex; justify-content: space-between;"><div>\$ _____ x _____ = \$ _____</div><div></div></div> <div style="text-align: right; padding-top: 10px;">TOTAL: \$ <b>27,000.00</b></div>		<div>A. ADEQUATE PROTECTION PAYMENTS OR _____ \$ _____</div> <div>B. SECURED CLAIMS: <input type="checkbox"/> Debtor represents no secured claims. <input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows: 1. <input checked="" type="checkbox"/> Trustee pays secured ARREARS: Cr. <b>R &amp; G MORTGAGE C</b> Cr. <b>FIRST BANK</b> Cr. _____ # <b>9034</b> # <b>5067</b> # _____ \$ <b>20,737.72</b> \$ <b>438.90</b> \$ _____ 2. <input type="checkbox"/> Trustee pays IN FULL Secured Claims: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 4. <input type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder: 5. <input type="checkbox"/> Other: _____ 6. <input checked="" type="checkbox"/> Debtor otherwise maintains regular payments directly to: <b>FIRST BANK</b> <b>R &amp; G MORTGAGE C</b> C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2) D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims. 1. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: _____ <input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: _____ Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 2. Unsecured Claims otherwise receive PRO-RATA disbursements.</div>	
Additional Payments: \$ _____ to be paid as a LUMP SUM within _____ with proceeds to come from:  <input type="checkbox"/> Sale of Property identified as follows: _____  <input type="checkbox"/> Other: _____  Periodic Payments to be made other than, and in addition to the above: \$ _____ x _____ = \$ _____			
PROPOSED BASE: \$ <b>27,000.00</b>			
<b>III. ATTORNEY'S FEES</b> (Treated as § 507 Priorities)			
Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$ <b>2,500.00</b>			
Signed: <u>/s/ MIGUEL A SERRANO FIGUEROA</u> Debtor  <u>/s/ MARITZA BERMUDEZ BERMUDEZ</u> Joint Debtor		<b>OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.)</b> <b>1. INCOME TAX REFUNDS WILL BE DEVOTED EACH YEAR, AS PERIODIC PAYMENTS, TO FUND THE PLAN UNTIL COMPLETION. THE TENDER OF SUCH PERIODIC PAYMENTS SHALL DEEM THE PLAN MODIFIED BY SUCH AMOUNT, WITHOUT THE NEED OF FURTHER NOTICE, HEARING OR COURT ORDER. MAY DEBTOR(S) NEED TO USE A PORTION OF SAID REFUND, PRIOR AUTHORIZATION OF THE COURT SHALL BE SOUGHT BY DEBTOR(S).</b>	

Attorney for Debtor **JIMENEZ - QUINONES LAW OFFICES**

Phone: **(787) 282-9009**

Debtor(s)

**CHAPTER 13 PAYMENT PLAN**  
Continuation Sheet - Page 1 of 1

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Executory Contracts - Assumed:

JOSE BERRIOS HERI

Label Matrix for local noticing  
0104-3  
Case 10-05520-BKT13  
District of Puerto Rico  
Old San Juan  
Mon Aug 2 10:55:22 AST 2010

RG MORTGAGE CORPORATION  
c/o WALLACE VAZQUEZ SANABRIA  
17 MEXICO STREET, SUITE D-1  
SAN JUAN, PR 00917-2202

ACADEMY COLLECTION SERVICE, INC.  
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SAN JUAN, PR 00918-1727

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ENGLEWOODS CLIFFS, NJ 07632-0244

Palisades Collections, LLC  
Vativ Recovery Solutions LLC  
As Agent For Palisades Collections, LLC  
PO Box 19249  
Sugar Land TX 77496-9249

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FACTURACION Y COBRO  
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SAN JUAN, PR 00922-2129

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WILMINGTON, DE 19850-5760

PLAN DE SALUD DEL HOSPITAL MENONITA  
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AIBONITO PR 00705-1379

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BANKRPUTCY DIVISION  
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SAN JUAN PR 00908-0146

FIRST MEDICAL CARD SYSTEM  
PO BOX 70264  
SAN JUAN, PR 00936-8264

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PO BOX 8299  
NAPLES, FL 34101-8299

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SERVICIO AL CLIENTE  
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The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)RG MORTGAGE CORPORATION  
c/o WALLACE VAZQUEZ SANABRIA  
17 MEXICO STREET, SUITE D-1  
SAN JUAN, PR 00917-2202

End of Label Matrix	
Mailable recipients	37
Bypassed recipients	1
Total	38